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DATE FILED: April 17, 2020

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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TRU CREDITOR LITIGATION TRUST,

Plaintiff,

v.

DAVID A. BRANDON, JOSHUA
BEKENSTEIN, MATTHEW S. LEVIN, PAUL
E. RAETHER, NATHANIEL H. TAYLOR,
JOSEPH MACNOW, WENDY A.
SILVERSTEIN, RICHARD GOODMAN,
MICHAEL SHORT, RICHARD BARRY,

Defendants.
-----X

Case No. 1:20-cv-03054

NOTICE OF MOTION TO TRANSFER VENUE

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, along with the accompanying Declaration of Scott A. Rader and exhibits annexed thereto, Defendants David Brandon, Joshua Bekenstein, Matthew Levin, Paul Raether, Nathaniel Taylor, Joseph Macnow, Wendy Silverstein, Richard Goodman, Michael Short, and Richard Barry (the “Defendants”), by and through their counsel, Mintz, Levin, Cohn, Ferris, Glovsky, and Popeo P.C., will move this Court at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York 10007, on a date and time to be designated by the Court, for an Order pursuant to 28 U.S.C. §§ 1404(a) & 1412 transferring venue of this action to the United States District Court for the Eastern District of Virginia, Richmond Division, for anticipated referral to the Bankruptcy Court for the Eastern District of Virginia.

Dated: April 16, 2020
New York, New York

Respectfully submitted,

MINTZ, LEVIN, COHN, FERRIS,
GLOVSKY AND POPEO, P.C.

By: /s/ Robert I. Bodian
Robert I. Bodian
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Attorneys for Defendants

Plaintiff is directed to respond to Defendants' Motion to Transfer within five days by letter not to exceed three pages.

SO ORDERED.

April 17, 2020

DATE


VICTOR MARRERO, U.S.D.J.